

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MILAN HEGGS, ROY BECKFORD and PHILIP
LEGREE, *individually and on behalf of a class of
all others similarly situation,*

Plaintiffs,

and

DISABILITY RIGHTS NEW YORK,

Plaintiff,

and

DISABLED IN ACTION,

Plaintiff,

- against -

THE CITY OF NEW YORK, NEW YORK CITY
POLICE (NYPD), COMMISSIONER JAMES P.
O'NEILL; NYPD COMMISSIONER DERMOT
F. SHEA; NYPD OFFICER (P.O.) ROBERT
BERNHARDT; P.O. MOORAN, P.O. SLATER;
JOHN DOES 1-8,

Defendants.

No. 17-CV-03234 (RJD)(TAM)

**NOTICE OF MOTION FOR
CLASS CERTIFICATION**

PLEASE TAKE NOTICE that upon the accompanying Declaration of David B. Rankin dated September 19, 2022, and the exhibits annexed thereto; Declaration of Jean Ryan dated September 17, 2022; Declaration of Kathleen M. Collins dated September 17, 2022; Declaration of Michael L. Spiegel, dated September 16, 2022; Affirmation of Timothy A. Clune, dated September 19, 2022; memorandum of law, and upon all the previous pleadings and proceedings, Plaintiffs will move this Court, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, at a date and time to be decided by the Court, for an order certifying a class pursuant to Rule 23 of

the Federal Rules of Civil Procedure, and for such other and further relief as is just and proper.

Dated: New York, New York
September 19, 2022

Sincerely,



By:

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